



Security Enforcement Program Update and Case Review

Steven G. Crowe
Office of Security Enforcement
Office of Enforcement

April 6, 2011



Security Enforcement Program Update



- **Staffing**
- **FY 2010 screened and scored 937 initial Security Incident Notifications and 832 Final Inquiry Reports**
- **Conducted Security Enforcement Workshop at the EFCOG SSWG October 2010 Meeting**



Security Enforcement Program Update

(cont'd)



- **CY 2011 Regulatory Assistance Reviews – LANL, Paducah, and INL**
- **CY 2011 Follow-up Reviews – LLNL and Y-12**
- **Active Security Incident Trending and Analysis Process; Monthly Meetings**



Security Enforcement Case Review

CY 2010 and 2011



- **PNOV - Bechtel Jacobs Company, LLC - (ETTP)**
- **PNOV - Battelle Energy Alliance, LLC - (INL)**
- **Settlement Agreement – Sandia Corporation - (SNL)**



Case Review



Bechtel Jacobs Company, LLC

- **ETTP Security Event – January 2007**
 - Theft of Classified Matter from the East Tennessee Technology Park
- **Key Factors**
 - Willful nature of the event
 - Level and amount of information involved
 - Extended period of time noncompliant security conditions existed
 - Past security history of BJC



Case Review



Bechtel Jacobs Company, LLC (cont'd)

■ Enforcement Approach

- EM-HQ and OR involvement throughout the Enforcement process
- Motivate BJC to improve security performance

■ Enforcement Outcome

- PNOV issued July 2010 – (SEA-2010-01)
- Two Severity Level I, and one Severity Level II Violations
- Each Violation cited for 3 days – total base civil penalty of \$750,000
- 25 Percent mitigation for corrective actions – total civil penalty of \$562,500



Case Review



Battelle Energy Alliance, LLC

- **INL Security Event – March 2009**
 - Introduction of Classified Information into an Unapproved System
- **Key Factors**
 - Significance of the level of information involved
 - Management involvement and gross negligence
- **Enforcement Approach**
 - NE-HQ and ID involvement throughout the Enforcement process
 - Enforcement Conference conducted in July 2010
 - Motivate BEA to improve security performance



Case Review



Battelle Energy Alliance, LLC (cont'd)

■ Enforcement Outcome

- PNOV issued February 2011 – (SEA-2011-01)
- Three Severity Level I, and one Severity Level II Violations
- Each Violation cited for 2 days – total base civil penalty of \$700,000
- 25/50 Percent mitigation for corrective actions – total proposed civil penalty of \$425,000



Case Review



Sandia Corporation

■ SNL Security Trend – CY 2007, 2008, and 2009

- Adverse Classified Information Security Trend at Sandia National Laboratories
- Enforcement Letter Issued May 2008

■ Key Factors

- Increased frequency of security incidents
- Increased severity level of security incidents
- Ineffective causal/root cause analysis and corrective actions to prevent recurrence



Case Review



Sandia Corporation (cont'd)

■ Enforcement Approach

- NNSA and SSO involvement throughout the Enforcement Process
- Enforcement Conference conducted in August 2010
- Motivate Sandia to address adverse security trend

■ Enforcement Outcome

- Settlement Agreement issued March 2011 – (SSA-2011-01)
- Implementation of the SNL Security Improvement Plan



Questions?